

Holland, Teresa

From: Stephen Dobson [mailto:ramtec.com.au]
Sent: Monday, 12 September 2011 12:31 AM
To: DCCEE - Residential Disclosure
Subject: Submission
Attachments: submission sept 11.doc

Dear Sirs,

Please find attached a submission from Ramtec. The key part of the submission is copied below. It is NOT confidential.

Please acknowledge receipt of this.

Thankyou.

Stephen Dobson, Ramtec Pty Ltd.

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Email: mail@ramtec.com.au

Website: www.ramtec.com.au

General/overall comments

The objective is to lessen use of electricity, gas and water.

Records of usage of the house should be used ie actual usage. For given periods of at least a full year (so all seasons are covered, at least once). If longer periods of usage are available then more certainty exists and stronger weight should be given to the actual usage of services.

The idea is to AVOID using the Government approved energy rating tools that discriminate against buildings with walls of unfired earth (like mud brick and rammed earth).

The actual energy useage of the building should be compared to national actual usages and national desired usages.

Adjustments may be needed for:

Climate zones

Size of house/number of occupants...all usages to be per square meter for the various climate zones.

Other factors.

As the desire of all this is to reduce actual energy consumption then MEASURE the actual energy consumption (from the invoices of the house ...or records direct from the suppliers of the electricity gas and water), and do not use the rating tools that are predictors...when actual usage from occupation is available.

At least allow ACTUAL usage to be allowed to get over the line, (to let the sale go ahead) as an alternative to the Government loved and industry feared thermal rating tools eg Accurate eg Natheers.

Submission Template

Residential Buildings Mandatory Disclosure – Consultation Regulatory Impact Statement - July 2011

Overview

This submission template should be used to provide comments on Residential Building Mandatory Disclosure Consultation Regulatory Impact Statement (CRIS).

Contact Details

Name of Organisation:	Ramtec
Name of Author:	S Dobson
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Website:	www.ramtec.com.au
Date:	11/9/11

Confidentiality

All submissions will be treated as public documents, unless the author of the submission clearly indicates the contrary by marking all or part of the submission as 'confidential'. Public submissions may be published in full on the Department of Climate Change and Energy Efficiency or other relevant Government websites, including any personal information of authors and/or other third parties contained in the submission. If any part of the submission should be treated as confidential then please provide two versions of the submission, one with the confidential information removed for publication.

A request made under the *Freedom of Information Act 1982* for access to a submission marked confidential will be determined in accordance with that Act.

Do you want this submission to be treated as confidential? Yes No

Submission Instructions

Submissions should be made by **close of business on 12 September 2011**. The Department reserves the right not to consider late submissions. Please restrict your submission to 4 pages of comments

Where possible, submissions should be lodged electronically, preferably in Microsoft Word or other text based formats, via the email address – residentialdisclosure@climatechange.gov.au

Submissions may alternatively be sent to the postal address below to arrive by the due date.

*Residential Energy Efficiency
Department of Climate Change and Energy Efficiency
GPO Box 854
Canberra ACT 2601*

Residential Buildings Mandatory Disclosure – Consultation Regulatory Impact Statement (CRIS)- July 2011

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C-RIS Section number: <i>[insert section number eg 3.1]</i>	Comments

Holland, Teresa

From: Stephen Dobson [mailto:ramtec.com.au]
Sent: Monday, 12 September 2011 1:14 PM
To: DCCEE - Residential Disclosure
Subject: Submission: Submissions on Residential Building Mandatory Disclosure initiative close Monday 12 Sep

Dear Sirs,

I made a submission last night on the proper template.

This is additional information/opinion from Ramtec.

Please add this.

The whole basis that you (or at least your paid consultants Allen Group) seems to be promoting is to use the Government approved rating tools to "predict the energy performance" of built houses.

It is a widely held opinion in the community and ESPECIALLY in the community connected to high thermal mass buildings such as unfired earth (mud brick, rammed earth etc) that the rating tools are quite inappropriate.

Their mandatory use prior to any NEW building being approved in Australia has decimated the numbers of unfired earth buildings able to be constructed new in australia, over recent years.

Use of these same tools to rate such buildings (high thermal mass buildings such as unfired earth... mud brick, rammed earth etc) on resale could make these homes look as bad (energy use wise) buys. But that is not the case.

Measuring the ACTUAL ENERGY USED is easy as all the records have been generated over the life of the house.

Why not use them.

At the very least allow this procedure as an alternative to those dastardly rating tools.

To make this a reality there are many ways:

One is that energy usage of EVERY building in Australia becomes publically available ie anyone can search the energy records of ANY building (that is placed on the market) and the Government MAKES the providers of Gas, Elecricity and Water provide this information publically.

Also the government would need to PUBLICALLY put out common usage figures, averages, targets etc . And methods of calculating usages per square meter and per person and so forth for the various climate zones should also be publically available.

Gnetlemen and Ladies...you MUST have a system as an alternative to the current rating tools such as Nathers Accurate, Berspro etc and AS THERE ARE ACTUAL FIGURES AVAILABLE THEN THEY MUST BE USED, AND NOT A SIMULATION TOOL.

I hope that you can see the benefit in actual over projected figures.

ABSA may not like this but why are you considering handing them a licence to print money for a SECONDrate system?

Also you need to give some credit for embodied energy. This is a big energy issue and all the rating tools ignore it. It MUST be addressed in your scheme and it is easy to do as the Government does the research and allows the public to tick simple boxes as to what the house is built from and to see the benefits of different materials.

Also you need to give some benefit to longetivity and recyclability and sustainability as in these aspects earth buildings are the "best available" but they are ignored to date. Earth building are MASSIVELY advantageous in bushfires and this needs to be given some credit along the way too.

You CANNOT ignore these matters in your new proposals.

If you keep on with lightweight houses well insulated with good fluffy insulation (that must be kept dry), and which must be tightly sealed (promoting sick building syndrome) ...all of the sort of stock favoured by the existing rating tools then the housing stock of Australia will be diminished in quality . And DRAMATICALLY SO.